

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

In Re:	:	
	:	
Aleksandor Vulfov	:	Chapter 13
Lioudmila K. Vulfov	:	
Debtors,	:	Case No. 18-18463-AMC
-----	:	
	:	
U.S. Bank Trust National Association,	:	
as Trustee of Cabana Series IV Trust	:	
	:	
Movant,	:	
v.	:	Hearing: July 14, 2020 at 11:00 a.m.
	:	Courtroom # 4
Aleksandor Vulfov	:	
Lioudmila K. Vulfov	:	
	:	
Debtors,	:	
	:	
and	:	
	:	
William C. Miller, Esquire	:	11 U.S.C. §362(d)
Trustee,	:	
	:	
Respondents.	:	

**STIPULATION RESOLVING MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

THIS matter being opened to the Court by Brian E. Caine, Esquire, of the law office of Parker McCay P.A., attorney for the secured creditor, U.S. Bank Trust National Association, as Trustee of the Cabana Series IV Trust, (hereinafter “Movant”), upon a Motion for Relief from the Automatic Stay as to Real Property, more commonly known as 17 Remington Place, Warminster PA 18974; and Diana M. Dixon, Esquire appearing on behalf of Debtors, Aleksandor Vulfov and Lioudmila K. Vulfov, and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. As of July 9, 2020, the post-petition arrears are \$23,216.06 – which represents payments of \$2,650.57 each due November 1, 2019 through July 1, 2020 – with a suspense balance of \$1,047.72 and \$408.65 in late fees.
2. The Debtors agree to reimburse the Movant for its attorney fees (\$850.00) and costs (\$181.00) for prosecution of the within Motion.
3. The Debtors shall make a payment to Movant in the amount of \$5,000.00 by July 17, 2020.

4. The Debtor shall make the regular monthly payment due August 1, 2020 by August 1, 2020.
5. The Debtors shall cure the remaining post-petition arrears (\$18,216.06), plus the motion fees and costs (\$850.00 plus \$181.00) by adding \$1,603.93 to the regular monthly payments each due September 1, 2020 through August 1, 2021.
6. The Debtors will resume regular monthly payments to Movant starting with the September 1, 2021 payment, and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtors shall remit payments directly to Movant as same come due.
7. If the Debtors fail to make any of the payments stated herein by their due date, then counsel for the Movant may send Debtors and Debtors' attorney a notice of default, and the Debtors shall have 14 days from the date of the notice to cure said default. If the default is not cured timely cured, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay, as to the mortgaged property herein.
8. Debtors agree that Movant may charge attorney fees of \$100 for each notice of default letter.

(remainder of page intentionally left blank)

The undersigned hereby consent to the form and entry of the within Stipulation.

/s/Brian E. Caine
Brian E. Caine, Esquire
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/s/Diana M. Dixon
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/s/Jack Miller ***
Concurrence by the Chapter 13 Trustee

It is hereby **ORDERED**, that the foregoing Stipulation is approved, shall be, and is made and Order of this Court.

Date: _____

ASHELY M. CHAN
U.S. BANKRUPTCY JUDGE

*** The standing trustee has received a stipulation in case number no. 18-18463.
Since we are without the current ability to return a signed stipulation copy, indicating that we have no objection to its terms, without prejudice to any of our rights and remedies, you are authorized to affix my electronic signature - /s/ - incorporating that conditional language